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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REZA RAE POURIAN,

Plaintiff,

V.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:18-cv-04536-RS

STIPULATION AND ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE AND ALLOW UNITED
STATES TO FILE AN AMENDED
ANSWER

Plaintiff Reza Rae Pourian and Defendant the United States of America, through their respective undersigned counsel of record, stipulate as follows and respectfully request an order pursuant to this stipulation for a continuance of the case management conference currently set for June 20, 2019, and to allow the United States to file an amended answer.

1. Plaintiff Reza Rae Pourian filed his Complaint in this matter on July 26, 2018, seeking a refund of \$134,529, plus interest, based on an alleged overpayment of federal income tax for tax year 2011. (Docket No. 1)

2. The United States timely answered on October 2, 2018. (Docket No. 13).

1 3. The Court conducted an initial case management conference on November 15, 2018.
2 Subsequently, the Court issued its Case Management Scheduling Order which sets a Further Case
3 Management Conference for June 20, 2019, at 10:00 a.m. (Docket No. 25).

4 4. Since the Court's Order, the parties have been engaged in discovery and the United
5 States has found it must amend its Answer in order to assert additional defenses.

6 5. Accordingly, the parties stipulate, pursuant to Rule 15(a)(2) of the Federal Rules of
7 Civil Procedure, that the United States may file an Amended Answer in the above-captioned case
8 on or before June 7, 2019.

9 6. Furthermore, due to a scheduling conflict with government counsel's calendar and to
10 allow the parties additional time to pursue resolution discussions, the parties seek to continue the
11 Further Case Management Conference currently set for June 20, 2019, for sixty days.

12 7. This is the parties' first stipulation for a continuance of the second case management
13 conference.

14 Dated this 29th day of May, 2019

15 RICHARD E. ZUCKERMAN
16 Principal Deputy Assistant Attorney General

17 */s/ Amy Matchison*
18 AMY MATCHISON (CA SBN 217022)
19 Trial Attorney, Tax Division
20 United States Department of Justice

21 *Attorneys for UNITED STATES OF AMERICA*

22 Dated this 29th day of May, 2019

23 SIDEMAN & BANCROFT LLP

24 By: */s/ Jay R. Weill*
25 Jay R. Weill
26 Travis W. Thompson

27 *Attorneys for REZA RAE POURIAN*

1 IT IS SO ORDERED.
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Dated this 30 day of May, 2019


RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

ECF CERTIFICATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that I obtained concurrence in the filing of this document from the signatory indicated by the conformed signature (/s/) of Jay R. Weill.

/s/ Amy Matchison
AMY MATCHISON
Trial Attorney, Tax Division
U.S. Department of Justice